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February 2, 2001

Mr. Gregory Q. Hill  
Hughes, Hill and Tenney, LLC  
160 East Main Street  
Suite 200 - P.O. Box 560  
Decatur, IL 62525-0560

RE: SEIEC V. IP - Docket Number 00-0583

Dear Greg:

In reviewing the Answers of IP to the Interrogatories filed by SEIEC, I note the following Interrogatories to which you have made an objection:

Int. 14: You object to this Interrogatory even though IP claims the right to serve the customer in question under Sections 1, 3 & 4 of the Service Area Agreement. Section 1 deals with "new customers", "points of delivery not energized or not in existence" on the date of the Agreement, "coal mining operations", etc.. Section 3 deals with territorial boundary lines with certain exceptions. Section 4 deals with service areas, again with certain exceptions. In addition, Section 4 incorporates provisions of the Electric Supplier Act when determining certain service rights.

Int. 14 requests information regarding the distribution and transmission lines of IP, points of delivery and dates of existence and/or energized along with the maps thereof. These requests are relevant or may lead to relevant information. Therefore, we request that IP promptly provide full and complete responses to the same.

In addition, you mentioned IP will be providing distribution maps on short order. This Response was dated by IP October 30, 2000. More than 90 days have elapsed since that time. Thus, I request that you provide those distribution maps and the above information promptly.

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Int. 15: IP has objected to this Interrogatory. The Interrogatory requests information regarding the factual basis upon which IP believes that it has the right to serve the customer, the "proximity" of the IP facilities, the "normal service connection point" to be used by IP to serve the customer and the routes to be used to serve the customer. These are relevant inquires based upon the Service Area Agreement and the Electric Supplier Act all of which may be involved in the determination of this dispute.

Int. 16: Interrogatory 16 requests information regarding the "normal service connection point" and the IP "points of delivery" in existence on July 2, 1965. These are terms defined in the ESA and "point of delivery" is utilized in the Service Area Agreement.

IP claims that it does not have engineering information from the customer and therefore cannot answer this Interrogatory. IP had to make some determinations based upon the information requested in this Interrogatory in order to make a claim that it is entitled to serve the customer. Accordingly, SEIEC requests IP to provide that information promptly.

Int. 18: This Interrogatory requests information about the distribution and/or transmission lines IP intends to connect to and the "points of delivery" on those transmission and/or distribution lines that IP intends to use to serve the customer. IP has to have information regarding those facilities or IP could not have claimed the rights to serve the customer.

Int. 19: SEIEC requests IP furnish such information as it has in its possession sufficient to determine the location of the service connection to the customer's facilities. If IP does not yet have that information, SEIEC requests that this Interrogatory be responded to promptly upon obtaining the same.

Int. 20: IP has information regarding its "points of delivery" that were in existence on the effective date of the Service Area Agreement which IP believes it may use to serve the customer in question. Therefore, IP has sufficient information to answer this Interrogatory.

Int. 21: IP has made a claim to be entitled to serve the customer. Thus, IP has made preliminary inquires and investigations to determine what facilities of IP are "adequate" to serve the customer. Therefore, SEIEC requests IP to respond with such information to this Interrogatory.

Int. 22: IP has made an initial determination that it is entitled to serve the customer. Therefore, SEIEC requests IP to furnish the information relied upon by IP in making that determination that is responsive to Interrogatory No. 22.

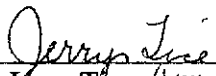
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Int. 23: To the extent IP has made any preliminary calculations of the costs to provide electric service to the customer, SEIEC requests that such information be provided as responsive to this Interrogatory.

SEIEC requests that IP supplement its Answers to the Interrogatories with any additional information available since October 30, 2000, and to provide the information to which IP objected to when responding to the above Interrogatories. If IP has not provided this information by February 28<sup>th</sup>, 2001, then SEIEC will assume that IP intends not to provide such information and SEIEC will be required to file enforcement proceedings.

Sincerely,

GROSBOLL, BECKER, TICE & REIF

BY:   
Jerry Tice (mm)

JT:mjm